

EXHIBIT D



Oregon

Theodore R. Kidington, Governor

18-11-209 17:38 Pg: 2

Oregon Student Assistance Commission

Office of Degree Authorization

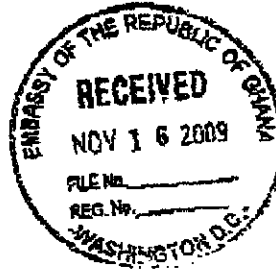
1500 Valley River Drive, Suite 100, Eugene, OR 97401

(541) 687-7452; Fax: (541) 687-7419

www.oregonstate.or.us/ODA

October 30, 2009

Mr. Kwame Daney
National Accreditation Board (NAB)
No. 6 Bimako Street, East Legon
P. O. Box CT 3256
Accra
GHANA



Dear Mr. Daney:

It has come to our attention that your agency may be about to issue an approval or accreditation to the notorious entity that does business under the name St. Luke "School of Medicine" or the like. We are concerned that an entity with the unsavory history of the St. Luke business might be allowed to issue so-called "medical degrees" that could be used by unscrupulous people around the world to practice medicine on unsuspecting patients.

We are concerned about what such a decision would mean to the reputation of Ghanaian colleges around the world. Oregon banned the use of St. Luke degrees several years ago, and we would have to ban the use of all Ghanaian degrees if St. Luke is approved. The reason for this is that Oregon law requires us to base acceptance of foreign degrees on the accreditation practices of the nation in question.

If the government of Ghana authorizes St. Luke to issue "medical degrees" we will have no choice but to conclude that Ghana does not have a meaningful postsecondary approval process, in which case degrees issued by the 23 colleges now operating in Ghana would no longer be usable in Oregon.

Oregon is a small state far from Ghana and it may be that a ban on all degrees issued in Ghana would not affect your country very much. However, we urge you to consider the consequences of other states and nations making similar decisions if you issue an approval to grant medical degrees to the entity called St. Luke.

It is possible that decision-makers in Ghana simply did not have all of the information about St. Luke's past practices and its desperate search for a government willing to allow it to sell degrees from a site outside the United States, where it began operating illegally in California some years ago. St. Luke is not and has never been a legitimate provider of medical degrees.

Sincerely,

Alan Contreras
Administrator

Mr. Adolphus K. Arthur, Deputy Chief of Mission, Embassy of Ghana, Washington, D.C.
Akame Cook, Desk Officer for Ghana, U.S. Department of State, Washington, D.C.
Dr. R. Stephen Hunt, USNSC, International Affairs, U.S. Department of Education, Washington, D.C.
Mary Se well, Public Affairs Officer, Embassy of the United States, Accra, Ghana

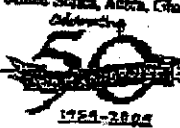


EXHIBIT E



Oregon

Theodore R. Kulongoski, Governor

Oregon Student Assistance Commission

Office of Degree Authorization

1500 Valley River Drive, Suite 100, Eugene, OR 97401

(541) 687-7452; Fax: (541) 687-7419

www.osac.state.or.us/ODA

October 30, 2009

Mr. Kwame Dattey
National Accreditation Board (NAB)
No. 6 Bamako Street, East Legon
P. O. Box CT 3256
Accra
GHANA

Dear Mr. Dattey:

It has come to our attention that your agency may be about to issue an approval or accreditation to the notorious entity that does business under the name St. Luke "School of Medicine" or the like. We are concerned that an entity with the unsavory history of the St. Luke business might be allowed to issue so-called "medical degrees" that could be used by unscrupulous people around the world to practice medicine on unsuspecting patients.

We are concerned about what such a decision would mean to the reputation of Ghanaian colleges around the world. Oregon banned the use of St. Luke degrees several years ago, and we would have to ban the use of all Ghanaian degrees if St. Luke is approved. The reason for this is that Oregon law requires us to base acceptance of foreign degrees on the accreditation practices of the nation in question.

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Sincerely,

Alan Contreras
Administrator

cc: Mr. Adolphus K. Arthur, Deputy Chief of Mission, Embassy of Ghana, Washington, D.C.
Akuma Cook, Desk Officer for Ghana, U.S. Department of State, Washington, D.C.
Dr. E. Stephen Hunt, USNEI, International Affairs, U.S. Department of Education, Washington D.C.
Mary Scholl, Public Affairs Officer, Embassy of the United States, Accra, Ghana



EXHIBIT F

UNIVERSITY OF ILLINOIS COLLEGE OF MEDICINE

Office of the Regional Dean
at Urbana-Champaign

190 Medical Sciences Building, MC-714
505 South Mathews Avenue
Urbana, IL 61801-3618

November 16, 2009

Mr. Kwame Dattcy
National Accreditation Board (NAB)
No. 6 Bamako Street, East Legon
P.O. Box CT 3256
Accra
GHANA

Dear Mr. Dattcy:

As the Dean of a medical school that recruits from the most accomplished graduates of non-U.S. medical schools into its residency, I have concerns about the impending accreditation decision for what purports to be the St. Luke School of Medicine. I have had the opportunity to review data in the public domain about this alleged school, and about individuals who claimed to have earned a medical degree from it. There is no evidence whatsoever that this alleged school really exists, or that there are adequate facilities for the most rudimentary components of a medical curriculum. In fact, all evidence says that only a small empty unimproved room is at the location advertised for the St. Luke's School of Medicine.

Understanding that high quality is not absolutely dependent upon physical structures, I took the opportunity to review the publicly available records of individuals who claim to have graduated from this alleged school for evidence of a bona fide education. There are records of twelve individuals who claim to have degrees from St. Luke's. None of these people are licensed to practice medicine, and at least two have been incarcerated for practicing medicine without a license.

I bring this to your attention because accreditation or approval of the alleged St. Luke School of Medicine by officials in Ghana would make medical schools in the United States worry about the quality of any medical school in Ghana. As a result, such approval of St. Luke would put the graduates of legitimate medical schools in your country at a distinct disadvantage when attempting to gain advanced medical training.

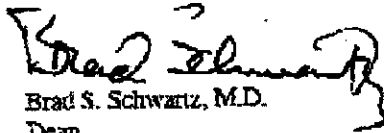
Hence, by denying accreditation to St. Luke School of Medicine you will protect the reputations of legitimate medical school graduates from Ghana. Moreover, by denying St. Luke any hint of legitimacy you will protect innocent patients from abuse at the hands of potential pseudo-graduates.

Telephone: (217) 333-5466 / Fax: (217) 333-9868 / Email: conner@med.uiuc.edu / www.med.uiuc.edu

UIC • Chicago • Peoria • Rockford • Urbana-Champaign

The entity that passes itself off as the St. Luke School of Medicine has never been a legitimate educator of medical practitioners, and I urge you to make the owners of this entity own up to their dishonesty.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Schwartz". The signature is stylized with a large, looped "B" and a trailing flourish.

Brad S. Schwartz, M.D.

Dean

Professor of Biochemistry and Medicine

1 Terroll Dolphin (Full Name)

2 P.O. Box 941009 (Address Line 1)

3 Los Angeles CA 90064 (Address Line 2)

4 310-384-4483 (Phone Number)

5 _____ (Fax Number)

6 jdolphin@stluke.edu (Email)

7 Plaintiff in Pro Per
(indicate Plaintiff or Defendant)

8
9
10 **United States District Court**
11 **Central District of California**

12 St. Luke School of Medicine, et al,) Case No.: 10-CV-1791 RGK (SHx)
13)

14 Plaintiff,)

15 vs.)

16 Republic of Liberia, et al,)

PROOF OF SERVICE BY MAIL

17 _____)

18 _____)

19 _____)

20 _____)

21 Defendant(s).)

22 I, Terroll Dolphin, declare as follows:
23 (name of person serving documents)

24 My address is P.O. Box 941009
25 Los Angeles CA 90064, which is located in
26 _____

27 the county where the mailing described below took place.
28

On 14 July 2010, I served the foregoing document(s) described as:
(date of mailing)

Plaintiff's Opposition to Defendants State of Oregon and
(list the names of the documents you are mailing)

Office of Degree Authorization

Plaintiff's Opposition to Memorandum of Points & Authorities
in Support of Motion by Dr. George Collin

on all interested parties in this action by placing a true and correct copy thereof in a

sealed envelope, with first-class postage prepaid thereon, and deposited said

envelope in the United States mail at or in Los Angeles CA,
(place of mailing)

addressed to: please see service list

(name) _____ (name)

(address) _____ (address)

(address) _____ (address)

I declare under penalty of perjury under the laws of the states of the United States that the foregoing is true and correct.

Executed on 14 July 2010 at Los Angeles CA.
(date) (place of signing)


(sign)

Terrell Delphin
(print name)

Service List

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Oregon Dept of Justice
1162 Court Street NE
Salem, OR 97301